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14 *Counsel for Defendants*
15 *Robert Bosch GmbH and*
16 *Robert Bosch LLC*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

*In re: Volkswagen 'Clean Diesel' Marketing,
Sales Practices, and Products Liability
Litigation*

This document relates to:

*Iconic Motors, Inc., et al. v. Volkswagen
Group of America, Inc., et al.*, No. 3:17-cv-
3185-CRB

LEAD CASE No. 15-md-02672-CRB

**DECLARATION OF PATRICK SWIBER
IN SUPPORT OF BOSCH
DEFENDANTS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Hon. Charles R. Breyer

1 I, Patrick Swiber, do hereby declare as follows:

2 1. I am an attorney at Cleary Gottlieb Steen & Hamilton LLP, counsel for Robert
3 Bosch GmbH and Robert Bosch LLC (the “Bosch Defendants”).

4 2. Pursuant to Civil Local Rule 79-5(d)-(f), I submit this declaration in support of the
5 Bosch Defendants’ Administrative Motion to Consider Whether Another Party’s Material Should
6 Be Sealed. The Bosch Defendants request that portions of their Reply in Support of Motion for
7 Summary Judgment (“Brief”), remain under seal. I have personal knowledge of the facts stated
8 herein and could and would testify competently to the matters stated.

9 3. The Brief contains information from documents Plaintiffs have designated
10 “Confidential” under the Stipulated Protective Order Governing Individual Dealer Actions, ECF
11 No. 5180 (“Protective Order”). Paragraph 12.3 of the Protective Order prohibits the Bosch
12 Defendants from filing this information publicly without written permission from the designating
13 party. The Bosch Defendants therefore respectfully seek leave to file these materials under seal
14 to permit Plaintiffs the opportunity to justify continued sealing under Local Civil Rules 79-5(c) &
15 (f)(3).

16 4. Pursuant to Local Civil Rule 79-5(e)(2), attached as Attachment 1 is an unredacted
17 version of the Brief with the portions sought to be redacted highlighted in yellow.

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19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed on March 21, 2025 in New York, New York.

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23 Patrick Swiber
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